



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

15-AMRP-0286

SEP 28 2015

Ms. J. A. Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Dear Ms. Hedges:

**RESPONSE TO ECOLOGY COMMENTS ON DRAFT A REVISION 4 OF THE PUREX  
AND B PLANT SURVEILLANCE & MAINTENANCE (S&M) PLANS**

In response to the Washington State Department of Ecology's (Ecology) letter to S. Charboneau, RL, and J. A. Ciucci, CHPRC, from E. Holbrook, "United States Department of Energy (USDOE) Letter 15-AMRP-0065, received February 3, 2015, 'Transmittal of the Draft A, Revision 4, Versions of the Surveillance and Maintenance Plans for the Plutonium-Uranium Extraction Facility, the 202-S Reduction Oxidation Facility, and the 221-B Facility,' RCRA Site ID: WA7890008967, NWP Compliance Index No.: 15.515," 15-NWP-065, dated April 1, 2015, the following information is being provided.

Letter 15-NWP-065 requests that the U.S. Department of Energy Richland Operations Office (RL) resubmit the pre-closure work plans for the PUREX Facility and B Plant Complex with updated Revision 4 S&M Plans incorporated as attachments.

As part of the overall process of preparing the key facilities for long-term surveillance and maintenance, the pre-closure work plans were developed to implement the B Plant and PUREX transition end point criteria documents and transition these facilities to the S&M Phase. These facilities have been, and continue to be, managed in an efficient, cost effective program which maintains the facilities in a safe condition that present no significant threat of release of hazardous substances into the environment and no significant risk to human health and the environment until final disposition is completed.

In accordance with the Hanford Federal Facility Agreement and Consent Order Action Plan (Tri-Party Agreement Action Plan), final disposition of B Plant and PUREX will be done under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as either a remedial action or a removal action and will follow the CERCLA remedial action process coordinated with Resource Conservation and Recovery Act Closure, as needed. The completion schedules will be established with Remedial Investigation/Feasibility Study (RI/FS) Work Plans and Remedial Design/Remedial Action (RD/RA) Work Plans in accordance with section 11.6 of the Tri-Party Agreement Action Plan (M-85 Milestones). Disposition of B Plant and PUREX will be addressed in Operable Units 200-CB-1 and OU-CP-1, respectively.

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Radioactive air emissions associated with the B Plant and PUREX facilities are currently managed under the U.S. Department of Energy Hanford Site Radioactive Air Emissions License FF 01. The FF 01 license is issued by the Washington State Department of Health and is incorporated into the Hanford Site Air Operating Permit (AOP). B Plant and PUREX will continue to follow the requirements in the license and AOP until transition to CERCLA is completed following the process described in Section 4.0 of the Statement of Basis for the Hanford Air Operating Permit.

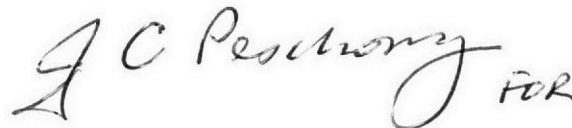
RL does not agree with Ecology's suggestion that the pre-closure work plans be modified. Section 9.3 of the Tri-Party Agreement Action Plan states that:

Modification of a report shall be required only upon a showing that the requested modification could be of significant assistance in evaluating impacts on the public health or the environment, in evaluating the selection of remedial alternatives, or in protecting human health and the environment.

It is the position of RL that the B Plant and PUREX pre-closure work plans are in compliance with the Tri-Party Agreement Action Plan and the changes requested by Ecology do not meet the criteria of the aforementioned citation of Section 9.3.

If you have any questions, please contact me or your staff may contact Al Farabee, of my staff, on (509) 376-8089.

Sincerely,

A handwritten signature in cursive script that reads "Ray J. Corey" followed by the initials "RJR" to the right.

Ray J. Corey, Assistant Manager  
for the River and Plateau

AMRP:WCW

cc: See page 3

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cc: D. J. Alexander, Ecology  
D. B. Bartus, EPA  
G. Bohnnee, NPT  
J. L. Boller, EPA  
V. M. Bogenberger, CHPRC  
R. Buck, Wanapum  
D. R. Corriell, CHPRC  
L. C. Cusack, CHPRC  
K. K. Dickerson, CHPRC  
B. J. Dixon, CHPRC  
K. Elsethagen, Ecology  
D. A. Faulk, EPA  
E. Holbrook, Ecology  
S. Hudson, HAB  
R. Jim, YN  
W. E. Kirby, CHPRC  
P. J. Martell, WDOH  
C. Mathey, WDOH  
R. M. Millikin, CHPRC  
K. Niles, ODOE  
R. E. Piippo, MSA  
J. B. Price, Ecology  
D. Rowland, YN  
S. N. Schleif, Ecology  
R. Skeen, CTUIR  
E. R. Skinnarland, Ecology  
J. Temple, Ecology  
K. A. Wooley, CHPRC  
Administrative Record: PUREX Facility and  
B Plant Complex  
Environmental Portal  
HF Operating Record (J. K. Perry, MSA, A3-01)